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SOLUTIA - 122

bcc: Richard Murawski, ORC
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CORRECTIVE ACTION PROJECT MANAGER	CORRECTIVE ACTION SECTION CHIEF	ECAB CHIEF	WPTD DIRECTOR
Ken Bardo	Ken Bardo, Acting Chief	Approved via Phone KB	[Signature]

acting SFD
 18 Aug 03

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D-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Hiller
Solutia Inc.
500 Monsanto Avenue
Sauget, IL 62206-1198

RE: RCRA Administrative Order on Consent, Docket No. R8H-5-00-003
CERCLA Administrative Order, Docket No. V-W-02-C-716

Dear Mr. Hiller:

As you know, in the Agency's letter of December 17, 2001, an integrated approach using Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) authority was proposed to address the discharge of contaminated groundwater to the Mississippi River. Specifically, a CERCLA interim action Record of Decision (ROD) would be implemented and used to demonstrate that the migration of contaminated groundwater at or from the Solutia facility is stabilized. A CERCLA Unilateral Administrative Order (UAO) to implement the interim action ROD was issued on September 30, 2002. Among other work items, the CERCLA UAO required three partially penetrating groundwater recovery wells capable of pumping a combined total of 303 to 724 gallons per minute along with the installation of a 3,500-foot long "U"-shaped, fully penetrating barrier wall.

On July 15, 2003 (on or about eight months after the effective date of the CERCLA UAO), the three groundwater recovery wells began extracting contaminated groundwater. However, the current pumping rate of the groundwater recovery wells is only approximately 140 gallons per minute (approximately 200,000 gallons per day). Additionally, the barrier wall has not been installed. Clearly, this pumping rate is insufficient, based on Solutia's modeling, to stabilize the migration of contaminated groundwater as required in Section VI.2 of the RCRA Administrative Order on Consent.

Furthermore, Solutia's choice to discharge extracted contaminated groundwater to the American Bottoms Regional Wastewater Treatment Facility limits the amount of groundwater that may be treated for

at least the initial 180 days. We believe this acclimation period is far too lengthy.

The Solutia facility is part of our Government Performance and Results Act baseline facilities that are of highest priority relative to the corrective action requirements of RCRA. It is our goal to achieve the CA 750 Environmental Indicator for the stabilization of the migration of contaminated groundwater at the Solutia facility by September 30, 2003.

We believe a meeting should be scheduled as soon as possible to discuss and solve these technical issues. To schedule a meeting date, please contact Mr. Nabil Fayoumi, Remedial Project Manager, Superfund Division, at 312-886-6840 or Mr. Kenneth Bardo, U.S. EPA Project Manager, Corrective Action Section, at (312) 886-7566.

Sincerely,

Margaret M. Guerriero, Acting Director William E. Muno, Director
Waste, Pesticides and Toxics Division Superfund Division

cc: Brent Gilhousen, Solutia
Richard Williams, Solutia
Linda Tape, Esq., Husch & Eppenberger, LLC
Jim Moore, IEPA
Gina Search, IEPA